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6 **UNITED STATES DISTRICT COURT**
7 **DISTRICT OF NEVADA**
8

9 DAVID R. DOBBINS and SHARON L.
DOBBINS, Trustees of the David and Sharon
10 Dobbins Revocable Family Trust,

11 Plaintiff,

12 vs.

13 GLENBROOK HOMEOWNERS ASS'N., a
Nevada non-stock, not-for-profit corporation;
14 TAHOE REGIONAL PLANNING AGENCY,
a separate legal entity created by bi-state
15 compact approved by the United States
Congress; and all other persons unknown
16 claiming any right, title, estate, lien or interest in
the real property described in this Complaint,
17 adverse to Plaintiffs' ownership or any cloud
upon Plaintiffs' title thereto,

18 Defendants.
19

Case No.: 3:22-cv-00495 MMD-CLB

ORDER GRANTING

**STIPULATION AND ORDER TO
EXTEND TIME FOR DEFENDANT
GLENBROOK HOMEOWNERS
ASSOCIATION TO FILE RESPONSIVE
PLEADING TO COMPLAINT**

(FIRST REQUEST)

20 Defendant GLENBROOK HOMEOWNERS ASSOCIATION ("GHOA") and Plaintiffs
21 DAVID R. DOBBINS and SHARON L. DOBBINS ("Dobbins"), by and through their attorneys,
22 hereby agree, stipulate, and respectfully request that the Court extend the deadline for GHOA to
23 answer or otherwise respond to Dobbins Complaint until December 16, 2022, representing a 45-day
24 extension for the filing deadline for GHOA's responsive pleading.

25 This is a first request for an extension of this deadline. In support of this Stipulation and
26 request for Order, the counsel for the parties stipulate as follows:

- 27 1. This action was commenced in Nevada's Ninth Judicial District Court as Case No.
28 2022-CV-00170.

2. Defendant GHOA was served with a Summons, Complaint, and Lis Pendens, by Plaintiff on October 11, 2022.
3. Before the 21-day deadline for GHOA to file a responsive pleading in the State Court action would expire on October 31, 2022, William A.S. Magrath II, counsel for GHOA, emailed Plaintiff's counsel on October 25, 2022, to request a 30-day extension of time for GHOA to file a responsive pleading, similar to the 30-day extension Plaintiff had granted to Defendant Tahoe Regional Planning Agency ("TRPA") to file a responsive pleading.
4. In a telephone conference between counsel for Dobbins and GHOA on October 26, 2022, and a subsequent email from Plaintiffs' counsel to GHOA counsel that same day, Plaintiffs' counsel agreed to extend GHOA's time to file a responsive pleading for an additional 30 days. GHOA counsel then confirmed this 30-day extension in an email to Plaintiffs' counsel dated Monday, October 31, 2022, and confirmed that GHOA would file its responsive pleading on or before December 1, 2022.
5. This agreement to extend time for GHOA to file a responsive pleading was confirmed by counsel before this matter was removed to the U.S. District Court. This is why counsel for GHOA and Dobbins have not previously filed a Stipulation and Order to Extend Time as required by Local Rule 1A 6-1 before the original October 31, 2022, deadline for GHOA to file a responsive pleading.
6. Since the October 26, 2022, agreement to extend the deadline for Defendant GHOA to file a responsive pleading, counsel for both GHOA and Plaintiffs have entered into substantive negotiations and discussions toward a compromise of all claims between Plaintiffs and GHOA which it is hoped will lead toward the dismissal of all claims in this litigation against all defendants. To accomplish this, counsel for Plaintiffs and GHOA have agreed to extend discussions an additional fifteen (15) days, for a total of forty-five (45) days, through and including December 16, 2022, to attempt to accomplish a compromise and settlement of the pending claims.
7. Based on the foregoing, the undersigned counsel, having previously agreed in written

correspondence to extend the deadline for GHOA to file a responsive pleading on or before December 1, 2022, and having verbally agreed to extend that date an additional 15 days to December 16, 2022, hereby request, as a first request, that the Court approve this agreement between counsel to extend the deadline for GHOA to file its responsive pleading on or before December 16, 2022.

This stipulation is entered into good faith and not for the purposes of delay. There have been no previous requests for extensions of time. This stipulation further extends that time so that the parties can focus on resolution.

DATED: November 23, 2022

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McDONALD CARANO LLP

MARY MARSH LINDE

By:


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*Attorneys for Defendant Glenbrook
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*Attorney for Plaintiffs David D. Dobbins
and Sharon L. Dobbins, Trustees.*

ORDER

IT IS SO ORDERED.


United States Magistrate Judge

DATED: November 28, 2022